

## **Exhibit A**

UNITED STATES DISTRICT COURT  
DISTRICT OF PUERTO RICO

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In re:	PROMESA
THE FINANCIAL OVERSIGHT AND	Title III
MANAGEMENT BOARD FOR PUERTO RICO,	No. 17 BK 3283-LTS
as representative of	(Jointly Administered)
THE COMMONWEALTH OF PUERTO RICO, <i>et</i>	
<i>al.</i> ,	
Debtors. <sup>1</sup>	

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**[PROPOSED] ORDER GRANTING MOTION BY THE AMERICAN FEDERATION OF  
STATE, COUNTY AND MUNICIPAL EMPLOYEES, AFL-CIO (AFSCME) TO  
COMPEL COMPLIANCE WITH THE AUGUST 10, 2017 STIPULATION AND ORDER**

Upon the motion (the “Motion”)<sup>2</sup> by the American Federation of State, County and Municipal Employees International Union, AFL-CIO (“AFSCME”), on behalf of its local affiliates in Puerto Rico and their members, requesting that the Court enter an order compelling the Mediation Team, Oversight Board, AAFAF, the COFINA Agent, and their professionals to comply with the Court’s August 10, 2017 Stipulation and Order Approving Procedure to Resolve Commonwealth-COFINA dispute (Docket #996) (“the Stipulation”); and the Court having jurisdiction to consider the Motion and the relief requested therein; and venue being proper before this Court; and notice of the Motion having been given as provided in the Motion, and such notice having been adequate and appropriate under the circumstances; and it appearing that

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<sup>1</sup> The Debtors in these Title III Cases, along with each Debtor’s respective Title III case number and the last four (4) digits of each Debtor’s federal tax identification number, as applicable, are the (i) Commonwealth of Puerto Rico (Bankruptcy Case No. 17 BK 3283-LTS) (Last Four Digits of Federal Tax ID: 3481); (ii) Puerto Rico Sales Tax Financing Corporation (Bankruptcy Case No. 17 BK 3284-LTS) (Last Four Digits of Federal Tax ID: 8474); (iii) Puerto Rico Highways and Transportation Authority (Bankruptcy Case No. 17 BK 3567-LTS) (Last Four Digits of Federal Tax ID: 3808); (iv) Employees Retirement System of the Government of the Commonwealth of Puerto Rico (Bankruptcy Case No. 17 BK 3566-LTS); and (v) Puerto Rico Electric Power Authority (“PREPA”) (Bankruptcy Case No. 17 BK 4780-LTS) (Last Four Digits of Federal Tax ID: 3747) (Title III case numbers are listed as Bankruptcy Case numbers due to software limitations).

<sup>2</sup> Capitalized terms not otherwise defined herein shall have the meanings ascribed to such terms in the Motion.

no other or further notice of the Motion need be provided; and the Court having held a hearing to consider the relief requested in the Motion; and the Court having found and determined that the relief sought in the Motion and granted herein is in the best interests of the Commonwealth, COFINA, their creditors, and all parties in interest, and that the legal and factual bases set forth in the Motion establish just cause for the relief granted herein; and after due deliberation and sufficient cause appearing therefor,

**IT IS HEREBY ORDERED THAT:**

1. The Motion is hereby granted as provided herein;
2. The Mediation Team, Oversight Board, AAFAF, the COFINA Agent, and their professionals shall comply immediately with the Stipulation, and specifically the procedures for negotiating a settlement to the Commonwealth-COFINA Dispute as set forth at Section 4 of the Stipulation, including but not only by not participating in any discussions to settle the Commonwealth-COFINA dispute with the Commonwealth Creditor Representative selected by the Ad Hoc Group of General Obligation Bondholders and Assured Guaranty Corp. (“the GO Creditor Representative”) unless and until such a settlement is reached between the Commonwealth Agent and the COFINA Agent first.
3. This Court shall retain jurisdiction to resolve any dispute arising from or related to this Order and to interpret, implement, and enforce the provisions of this Order.

SO ORDERED.

Dated: \_\_\_\_\_, 2018  
San Juan, Puerto Rico

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HONORABLE LAURA TAYLOR SWAIN  
UNITED STATES DISTRICT JUDGE